

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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WISTRON NEWEB CORPORATION,

Plaintiff,

-against-

GENESIS NETWORKS TELECOM SERVICES, LLC and
GNET ATC, LLC,

Defendants
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**NOTICE OF PLAINTIFF'S
MOTION FOR SUMMARY
JUDGMENT**

22-cv-02538 (LJL)

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, Local Rule 56.1 Statement of Undisputed Material Facts, Declaration of Jacob A. Englander, dated March 2, 2023 and the exhibits annexed thereto, and Declaration of Helen Wang, dated February 28, 2023 and the exhibits annexed thereto, and all other papers and proceedings in this action, Plaintiff Wistron NeWeb Corporation (“Plaintiff” or “WNC”) will move before The Honorable Lewis J. Liman, United States District Judge for the Southern District of New York, for an Order granting Plaintiff summary judgment on its claims (breach of contract and, in the alternative, account stated) as against Defendants Genesis Networks Telecom Services, LLC (“Genesis”) and GNET ATC, LLC (“GNET”) (collectively, “Defendants”) pursuant to Fed. R. Civ. P. 56, and awarding Plaintiff judgment in the amount of no less than \$9,212,256.94, plus interest, attorneys’ fees, and costs, jointly and severally, against Genesis and GNET.

Pursuant to the prior agreement of the parties (*see* Dkt. # 66), Defendants’ oppositions are due April 3, and Plaintiff’s reply is due April 21.

Dated: New York, NY
March 2, 2023

LAZARE POTTER GIACOVAS & MOYLE LLP

By: /s/ Robert A. Giacovas
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TO: All Counsel of Record (via ECF)